

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

V.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
"AZZMADOR" RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL "ENOCK"
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT AGAINST DEFENDANT
FRATERNAL ORDER OF THE ALT-KNIGHTS**

Plaintiffs respectfully request that this Court enter default against Defendant Fraternal Order of the Alt-Knights ("FOAK") pursuant to Federal Rule of Civil Procedure 55(a) on the

ground that Defendant FOAK has failed to plead or otherwise defend within the time prescribed by the Federal Rules of Civil Procedure (“FRCP”) and within the time prescribed by this Court.

Plaintiffs effected service on Defendant FOAK through service upon the entity’s founder, Kyle Chapman (“Chapman”), on December 21, 2017 at Alameda County Superior Court, 1225 Fallon Street, Oakland, CA 94612. (ECF 215.) Plaintiffs then mailed Chapman the First Amended Complaint on January 5, 2018. (ECF 175.)

In an order dated January 31, 2018 (“Order”), this Court found that Chapman’s numerous filings with the Court on behalf of Defendant FOAK—an “artificial entit[y]”— were improper because Chapman is not a licensed attorney. (ECF 211.) The Order directed Defendant FOAK to retain a licensed attorney to appear in this matter and file a proper responsive pleading within fourteen days of entry of the Order, making a response to the First Amended Complaint due on February 22, 2018. (ECF 211.)

More than two weeks have elapsed since the February 22, 2018 deadline, and Defendant FOAK has still failed properly to appear in this case. Accordingly, Plaintiffs respectfully ask the Court to grant this Motion to Enter Default against Defendant FOAK for failure to plead or otherwise defend under FRCP 55(a).

Dated: March 14, 2018

Respectfully submitted,

s/ Robert T. Cahill

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2018, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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Pro Se Defendant

I further hereby certify that on March 14, 2018, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan
a/k/a Loyal White Knights Church of
the Invisible Empire, Inc.
c/o Chris and Amanda Barker
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Richard Spencer
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-and-
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Moonbase Holdings, LLC
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East Coast Knights of the Ku Klux Klan
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Fraternal Order of the Alt-Knights
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